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June 12, 2014

Mr. Kevin Fortkiewicz  
Campaign Finance Analyst  
Reports Analysis Division  
Federal Election Commission  
Washington, DC 20463

Identification Number: C00488403

Reference: April Quarterly Report (01/01/2014 03/31/2014)

Dear Mr. Fortkiewicz:

Under Federal Law, you have to itemize any donations you receive during the calendar year that total over \$200 from an individual or entity. We get donations on an individual basis or have memberships paid on an annual or scheduled basis by credit card. To not be exposed to the liability of credit card fraud, we use a service to collect. Quarterly, during the reporting period, we move funds. We move them in two tranches. Those from people who donated \$100 or more during that period and those that have contributed small amounts, usually less than \$25 are included. Amounts under that \$100 self imposed low threshold we report as unitemized as we don't have to disclose the individuals, their employer or occupation like we do on those required to be itemized. When you file an 'Unitemized Amount' there is one more step that you have to do if it's over \$200. You have to right click on the entry from the list of total entries and 'unitemize' it to make it appear in the 'unitemized' column. I verified that I failed to do that and though they were several unitemized items, they mistakenly appeared in the itemized field with no information. That has now been corrected

When you try to charge on our web site you have to provide all of your information similar to what you would supply Amazon or some other online vendor. However, it also includes Occupation and Employer plus identifying whether the donor is a Company as opposed to an individual. If you do not provide the information, the charge will not go through. That information is retained in a sortable format on a spreadsheet program. When the time comes to transfer funds into the PAC Account, we print off the spreadsheet in order of greatest to least donation. We individually report the transfer of all of those that have given more than \$100 during the year. The rest we transfer are the unitemized of usually the \$25 and under variety. The \$1650 was the amount transferred that was unitemized in that report.

We do two more things where we know who gave us and how much as opposed to a hat pass where we cannot be certain. In a hat pass, it is very rare that you get anything larger than a twenty. We cannot accept more than \$100 in cash from an individual at one time. We have never had a hat pass with more than a single \$100 bill. Even that's a rare occurrence. Somebody once tried to give us \$1000 in cash, but we refused it citing the Campaign Finance Law. They subsequently gave us a check and we

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reported all of their information.

The second control includes checks mailed directly or placed in the hat. We report these as if they need to be itemized. You have an edit in the FEC Software which will add all donations unitemized below \$200 for an individual and switch them to itemized if they break \$200 for the year. Additionally, we organize all the donors alphabetically for the end of year report and see if anyone has broken \$200 for the year and is not yet itemized. We would make any necessary corrections at that point.

On the question on the different address, we will revert to the old address. We will address the Name Change through an amended Statement of Organization.

Thank you for your help.

Respectfully submitted,

William J. OSullivan, Jr.  
Treasurer  
Texas Patriots PAC

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